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LLC

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 ROBERT ROSS,
12 Plaintiff,

13 v.

14 AT&T MOBILITY LLC, ONE TOUCH
15 DIRECT, LLC, and, ONE TOUCH
DIRECT- SAN ANTONIO, LLC,

16 Defendant.

17 CASE NO. 4:19-CV-06669 (JST)

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**DECLARATION OF ASHLEY E.
JOHNSON IN SUPPORT OF JOINT
ADMINISTRATIVE MOTION TO
FILE DISCOVERY LETTER BRIEF
UNDER SEAL**

1 I, Ashley E. Johnson, declare and state as follows:

2 1. I am an attorney at the law firm of Gibson, Dunn & Crutcher LLP who is
3 admitted *pro hac vice* in this case on behalf of Defendant AT&T Mobility LLC
4 (“AT&T”).

5 2. I have personal knowledge of the facts set forth herein. If called as a
6 witness, I could and would competently testify to such matters.

7 3. On March 23, 2021, Plaintiff Robert Ross (“Ross”) and AT&T filed a joint
8 motion to file a redacted version of the attachment to their joint Discovery Letter to
9 Magistrate under seal.

10 4. The redacted version redacts a portion of the response to Interrogatory No.
11 9 by AT&T, which was designated as Attorney’s Eyes Only pursuant to the Protective
12 Order dated June 25, 2020 [Dkt 57] on the basis that it includes confidential and sensitive
13 information regarding AT&T’s measures to prevent SIM swaps.

14 5. AT&T’s response to Interrogatory No. 9 is sealable and entitled to
15 protection under the law because such measures are proprietary and kept confidential by
16 AT&T to protect its customers and its commercial interests. In particular, public
17 disclosure of AT&T’s security measures could harm customer security by making
18 individuals who seek to perform unauthorized SIM swaps aware of facts surrounding
19 such security measures.

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21 Executed on this 23rd day of March, 2021, in Dallas, Texas.

22 I declare under penalty of perjury that the foregoing is true and correct.

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24 By: /s/ Ashley E. Johnson
25 Ashley E. Johnson

26 *Attorney for Defendant AT&T MOBILITY, LLC*
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